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Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

Petition of the Public Utilities Commission of Ohio for)
Delegation of Additional Authority to Implement)
Number Conservation Measures)

CC Docket No. 96-98

File No. NSD-L-99-74

COMMENTS OF WINSTAR COMMUNICATIONS, INC.

October 20, 1999

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SUMMARY

WinStar applauds the PUCO's endeavor to gain control of the telephone numbering resource in Ohio, and appreciates the PUCO's efforts to craft a numbering optimization plan that will not undermine the national efforts currently underway. Accordingly, WinStar supports grant of limited additional authority to the PUCO to implement some of the measures proposed in the Petition. However, WinStar also has serious concerns that some of the measures contemplated by the PUCO, if implemented unilaterally, will hinder the establishment of an effective and efficient national numbering scheme.

First, WinStar fully supports a grant of authority to the PUCO to enforce current standards for number allocation, which have been developed by a broad cross section of the industry to ensure equitable access to resources for all service providers. To the extent that the PUCO can enforce these standards uniformly across all industry segments, it should be permitted to do so. At the same time, it is important that the FCC not abdicate its responsibilities to oversee this enforcement and, further, that the agency continues to ensure that these delegated responsibilities are in fact carried out in accordance with both the letter and the spirit in which the guidelines were written.

Second, WinStar fully supports the delegation to the PUCO of authority to reclaim NXX codes which have not been activated within the timeframes prescribed by the current Guidelines. In addition, while protected codes should be eliminated at every reasonable opportunity in order to encourage efficient utilization of the numbering resource, there are situations where protected codes remain desirable. Similarly, WinStar also generally supports the elimination of reserved NXX codes, although there often are sound technical or policy reasons for the reservation of codes. WinStar notes that the elimination of improperly used, reserved, and protected codes

should take place with full input from the industry and affected end users rather than through unilateral action.

In addition, WinStar urges the Commission to consider carefully the PUCO's request for authority to order efficient number use practices, in large part because the PUCO has not sufficiently explained the nature of the authority it is requesting. However, WinStar does support the concept of fill rates as long as rules regarding these rates make appropriate allowances for service providers that are new to a rate center to achieve the fill rates. WinStar also has supported requirements that service providers furnish tangible proof that they have achieved a utilization level sufficiently high to justify the acquisition of additional numbering resources. WinStar has serious concerns, however, about implementation of sequential number assignment, which is neither an effective nor an efficient numbering use practice.

WinStar strongly opposes grant of additional authority to the PUCO to implement additional rationing measures and technology- or service-specific overlays. The FCC has made clear that number rationing does not constitute appropriate NPA relief. WinStar is more concerned about the PUCO's request for authority to order technology- or service-specific overlays, which have been tried in areas particularly well suited for such overlays, and have failed abysmally. Moreover, WinStar is concerned that technology- and service-specific overlays will erect a statutory barrier to day number porting across technologies, as contemplated by the 1996 Act.

Finally, WinStar suggests that the FCC add Ohio to the list of states that will undertake an expanded number pooling trial involving NPAs that are not in an advanced stage of exhaust. Such a trial would provide the necessary objective and quantifiable data to determine whether pooling is in fact an effective measure to improve number utilization in Ohio.

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WinStar Communications, Inc. (“WinStar”), by its attorneys, hereby respectfully submits these comments on the Petition for Delegation of Additional Authority to Implement Number Conservation Measures (“Petition”) submitted by the Public Utilities Commission of Ohio (“PUCO”) on September 13, 1999.¹

In its Petition the PUCO has requested a grant of additional authority to implement certain area code conservation measures in the state of Ohio. Specifically, the PUCO has requested additional authority to: (1) enforce current standards for number allocation, or to set and enforce new standards and requirements; (2) order the return of unused, improperly used, reserved and/or protected NXX codes (and/or thousand blocks if number pooling is implemented); (3) order efficient number use practices within NXX Codes; (4) investigate and order additional rationing measures; (5) require number pooling where and when the state determines it to be appropriate; and (6) order technology- or service-specific overlay area codes.²

¹ Pursuant to Public Notice, DA 99-2016, released on September 29, 1999, interested parties may file comments on the Petition by October 20, 1999. These comments therefore are timely filed.

² Petition at 2.

WinStar applauds the efforts of the PUCO to gain control of the telephone numbering resource in Ohio, and believes that a limited grant of authority in several of the areas requested by the PUCO will be both appropriate and beneficial. However, as discussed more fully below, WinStar also believes that some of the additional authority the PUCO has requested must be severely delayed, limited, or denied altogether in order to prevent unilateral exercise of numbering authority that will hinder the establishment of an effective and efficient national numbering scheme that will benefit consumers and service providers alike.

I. ENFORCEMENT OF CURRENT STANDARDS FOR NUMBER ALLOCATION OR CREATION AND ENFORCEMENT OF NEW STANDARDS

WinStar fully supports a grant of authority to the PUCO to enforce current standards for number allocation.³ Indeed, the Numbering Resource Optimization Working Group in which both WinStar and the PUCO took an active part identified the lack of enforcement of existing guidelines as one of the significant contributing factors to the exhaust of the North American Numbering Plan (“NANP”) and the dramatic rate of increase in the number of new area codes being introduced throughout the NANP.

The existing guidelines were developed by a broad cross section of the industry. Participants included incumbent and competitive local exchange carriers, interexchange carriers, regulators, and the North American Numbering Plan Administrator (“NANPA”). Using the widely known and accepted industry consensus process, these entities arrived at guidelines with the intent of adhering to them to the benefit of the industry and its customers. WinStar, since its inception as a code holder, has supported the enforcement of these guidelines to ensure equitable access to resources for all service providers. To the extent that a state regulatory authority such

³ Petition at 4-5.

as the PUCO can enforce these standards uniformly across all industry segments and all service providers in those segments, WinStar believes that the FCC should permit state authorities to do so.

It is important, however, that the FCC not abdicate its responsibilities to oversee this enforcement and, further, that the agency continue to ensure that these delegated responsibilities are in fact carried out in accordance with both the letter and the spirit in which the guidelines were written. While WinStar believes that enforcement of the existing rules and guidelines by the PUCO could accrue to the benefit of the industry and consumers, WinStar also is somewhat concerned by the request for additional authority. As outlined above, the current guidelines were crafted with extensive input from all concerned parties, including regulators, and while not perfect, represent a delicate balance of the interests of consumers, regulators, and service providers. Hence, while WinStar does not oppose the judicious modification or addition of new guidelines, WinStar strongly believes that any such modifications must be made with full input from the concerned parties. WinStar further believes that the best method to achieve this is the industry consensus process.

Moreover, as WinStar has indicated in previous comments regarding the FCC's own pending numbering resource optimization proceeding, there also is a delicate balance between the unique needs of individual state jurisdictions and the need for uniformity and compatibility of operations, procedures, and technology through the NANP.⁴ Just as the PUCO would find it

⁴ See, e.g., Comments of WinStar Communications, Inc., *In the Matter of Numbering Resource Optimization, Connecticut Department of Public Utility Control Petition for Rulemaking to Amend the Commission's Rule Prohibiting Technology-Specific or Service-Specific Area Code Overlays, Massachusetts Department of Telecommunications and Energy Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781, and 978 Area Codes, California Public Utilities Commission and the People of the State of California Petition for Waiver to Implement a Technology-Specific or Service-Specific Area Code*, CC Docket No. 99-200, RM No. 9258, NSD File No. L-99- (continued...)

cumbersome, impractical, and probably even unworkable to permit every certificated service provider in Ohio to operate under a different set of rules and guidelines, service providers such as WinStar that operate in multiple states would find the burdens on their employees, networks, and operational support systems intolerable if major process differences existed in each state.

For this reason WinStar would encourage the FCC to direct the PUCO to convene industry meetings to discuss any substantive changes that it may be considering and obtain industry consensus before moving forward. In the case of changes that could or would impact service provider operations outside the state of Ohio, WinStar would ask the FCC to direct the PUCO to seek consensus for its proposals through the North American Numbering Council ("NANC") and any appropriate Working Group(s) or Sub Committee(s) under the auspices of the NANC.

II. THE RETURN OF UNUSED, IMPROPERLY USED, RESERVED AND/OR PROTECTED NXX CODES (AND/OR THOUSAND BLOCKS IF POOLING IS IMPLEMENTED)

The PUCO has requested authority to order the return of unused, improperly used, reserved, and/or protected NXX codes.⁵ Although the current guidelines vest authority to reclaim unused NXX codes with the NANPA, this authority rarely, if ever, has been exercised, and undoubtedly is a major factor contributing to the accelerating exhaust of the NANP. WinStar would fully support the delegation by the FCC to the PUCO of authority to reclaim NXX codes which have not been activated within the timeframes prescribed by the current Central Office Code Assignment Guidelines ("COCAG"). WinStar is less supportive, however,

(...continued)

17, NSD File No. L-99-36 (filed July 30, 1999), at 2-6 ("*WinStar Numbering Comments*").

⁵ Petition at 4-5.

of the PUCO's request to reclaim "improperly used, reserved and/or protected" codes or blocks. The reasons for WinStar's reservations in this regard stem from the lack of definition of these terms in the Petition, as well as some very real practical or technical considerations with regard to certain codes.

For example, in its Petition the PUCO does not specify what it means by the term "improperly used." An NXX code which has been obtained through the COCAG process, which has been properly activated on an authorized switching platform, and which is processing and completing live traffic, is, under the guidelines definition, "properly used." Any NXX code that has not achieved these milestones within the timeframe established by the guidelines is, and should be, subject to reclamation. As noted, it is unclear from the PUCO Petition just what is meant by the term "improperly used." At a minimum, the PUCO should clarify the scope of the authority it is seeking. Preferably, the PUCO should convene meetings with the industry to reach consensus on the proper use of NXX codes. As for so called "protected codes" – that is, codes which are not duplicated across NPA boundaries in order to preserve seven-digit dialing across NPA boundaries where a community of common interest exists – the NANP Guidelines already dictate that protected codes should be phased out in advance of NPA relief.

WinStar assumes that the PUCO is particularly concerned with unused and protected codes in the areas served by Cincinnati Bell. The Cincinnati Bell service area encompasses the greater Cincinnati metropolitan area, which includes both portions of Southern Ohio and Northern Kentucky. In fact, the Greater Cincinnati International Airport is physically located in Covington, Kentucky. In April of this year, the industry convened meetings in Kentucky to discuss NPA relief for the 606 area code in Northern Kentucky. At that time, consensus was reached to eliminate protected codes in this corridor, with the exception of the Covington rate

center. The Covington rate center is somewhat unique within the NANP because, although geographically located in Kentucky, it is encompassed by the 513 area code, which is generally identified exclusively with Ohio. Because of the strong ties between Covington and Cincinnati – only the most notable of which is the airport – the industry decided to continue to protect codes in this rate center. The consensus was that to do otherwise would, on the one hand, isolate the airport from the Greater Cincinnati community by placing it in a Kentucky area code, or, on the other hand, create confusion within Kentucky by having two area codes appear in the same rate center. The result of this decision was the inability to reclaim more than 30 protected codes. Nonetheless, there was a strong feeling that this was an appropriate decision.

WinStar offers this description of Cincinnati to illustrate that, while protected codes should be eliminated at every reasonable opportunity in order to encourage efficient utilization of the numbering resource, there are situations where protected codes remain necessary or at least highly desirable for reasons of community of interest. Again, while WinStar certainly would support a leadership role on the part of the PUCO with regard to the issue of protected codes, WinStar believes that such issues are best resolved by the consensus process. The Cincinnati case offers a particularly poignant example because the community of interest includes not only the industry, but also two state commissions and consumers from two states. Accordingly, any compromises that are reached regarding numbering optimization efforts generally, and the reclamation of protected codes more specifically, must serve the interests of both Ohio and Kentucky. Therefore, while WinStar supports a leadership role for the PUCO in eliminating protected codes, WinStar submits that the PUCO should not be able to do so unilaterally.

WinStar also supports, for the most part, the elimination of reserved NXX codes: efficient resource utilization is compromised when codes are reserved. However, there often are

sound technical or policy reasons for the reservation of codes. For example, it is common industry practice to reserve NXX codes that match the home and adjacent area codes. Certain switching equipment, both at the service provider and at the end user level, is incapable of supporting a format where the area code and the NXX code are the same. At a minimum such a configuration causes dialing delays in such equipment; in the worst case, calls to the affected NPA/NXX code cannot be completed. Accordingly, it generally is necessary to reserve these codes. Although there is no technical reason for doing so, the 800 and 900 NXX codes generally also are reserved because of the connotation of these numbers as NPA codes – specifically, 800 as a universal toll free code and 900 as a “pay per call” code. Here the purpose is to avoid the potential confusion on the part of consumers who might incorrectly assume that an 800 or 900 NXX would carry the same billing treatment as the associated NPA.

Again, the purpose of this discussion is not to imply that the PUCO should not be granted considerable authority to pursue the elimination of unnecessarily reserved codes. However, WinStar believes that the elimination of such codes should take place with full input from the industry and affected end users rather than through unilateral action on the part of a state regulatory body. In short, WinStar believes that the PUCO is on the right track in pursuit of the elimination or modification of codes which are not being optimally utilized. Nonetheless, WinStar believes that such optimization is best pursued with the full involvement and consensus of all affected parties, and hence that any authority granted to perform these functions should be granted on the condition that a consensus process be used to determine and define the nature and extent of that authority.

III. AUTHORITY TO ORDER EFFICIENT NUMBER USE PRACTICES WITHIN NXX CODES

The PUCO also seeks authority to order efficient number use practices with NXX codes – specifically, to order sequential use of numbers within an NXX or thousand block.⁶ Clearly, the request for additional authority to order efficient number use practices within NXX codes is outside the scope of the current COCAG, and, further, WinStar is concerned that, again, the PUCO has not sufficiently explained precisely the nature of the authority it is requesting. In other applications to the FCC for authority, states have sought authorization to mandate fill rates, sequential assignment of numbers, and justification for new NXX code applications. WinStar has supported the concept of fill rates as long as rules regarding these rates make appropriate allowances for service providers that are new to a rate center to achieve the fill rates. Specifically, WinStar has recommended a 40 percent fill rate requirement for service providers that have been present for less than three years in a given rate center, and 60 percent for those present for three years or more.⁷ WinStar would support the enforcement of such a requirement by state regulators, including Ohio. Similarly, WinStar believes that it is entirely appropriate for states, where they feel there is a need, to require service providers to furnish tangible proof that they have achieved a utilization level sufficiently high to justify the acquisition of additional numbering resources.

Sequential assignment of numbers, however – which, WinStar notes, the California Public Service Commission recently was granted authority to implement – is neither an effective nor an efficient numbering use practice. While, in the abstract, sequential assignment would appear to facilitate the ultimate efficiency in numbering assignment, a number of customer

⁶ Petition at 6.

⁷ See, e.g., *WinStar Numbering Comments* at 57-58.

service and technical issues must be accommodated in any practical sequential numbering assignment process. First, from a customer service perspective, it is not unusual for a business to request a “good” number when placing an order for service. For reasons of customer loyalty, effective marketing, and internal efficiencies, business customers often request, and sometimes require, access to numbers which have repeating digits (*e.g.*, 1000, 1111), sequential order (*e.g.*, 2345, 6543), or “anagram” significance (*e.g.*, 4357, which spells “help” on a key pad). Service providers typically reserve such numbers for business customers. In a true sequential assignment policy, the assignment of such numbers literally would become a matter of “luck of the draw.” This type of procedure would ill serve end-user customers or service providers.

Second, an inflexible sequential assignment procedure also would impose impenetrable technical barriers. Many multi-line telephone systems, and most PBX and Centrex systems, must administer numbers in contiguous blocks of 100 or 1000 numbers. These systems, virtually by definition, would be unable to accept random sequential number assignments. This makes necessary a mechanism to accommodate these very real technical limitations on end-user equipment that is likely to remain in use for several decades into the future.

Once again, WinStar is supportive of the direction the PUCO is attempting to pursue to ensure that the numbering resource is being allocated in an optimal manner. At the same time, WinStar believes that the best way to accomplish the equally important goals of maximizing efficiency of the resource and providing acceptable service to end users is to convene a meeting of the industry and develop consensus decisions to achieve these goals. If the FCC conditions approval of authority on this type of process, WinStar believes that the best interests of all parties will be served.

IV. AUTHORITY TO INVESTIGATE AND ORDER ADDITIONAL RATIONING MEASURES

Further, the PUCO has requested additional authority to investigate and order additional rationing measures.⁸ In previous proceedings dealing with the conservation and optimization of numbering resources, the FCC has made clear that rationing does not constitute NPA relief.⁹ For this reason, WinStar must oppose grant to the PUCO of additional authority for code rationing. Code rationing is, at best, an artificial method to extend the life of an area code which has, for practical purposes, already exhausted. The practical effect of rationing is to send an implicit – and sometimes explicit – message to new entrants to stay out of a market until NPA relief has been implemented. The other effect is to delay the entry of these new service providers into the affected market, a situation which stifles competition for time periods of a year or more in some cases. Rather than grant additional authority to ration, WinStar urges the Commission to reinforce its historic position that rationing is not relief and is to be avoided wherever possible. Once again, the industry consensus process has worked reasonably well, if not perfectly, to address these issues, and WinStar sees no useful purpose in further regulatory intervention.

V. AUTHORITY TO REQUIRE NUMBER POOLING WHERE AND WHEN THE STATE DETERMINES IT TO BE APPROPRIATE

The PUCO has asked the Commission to permit it to require number pooling where and when the PUCO deems pooling to be appropriate.¹⁰ Almost since the earliest deployment of

⁸ Petition at 6.

⁹ *Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 214, and 717*, NSD File No. L-97-42; *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Memorandum Opinion and Order on Reconsideration (rel. Sep. 28, 1998), ¶ 22.

¹⁰ Petition at 6.

number pooling, WinStar has been a consistent, if reluctant, supporter of this technical remedy to the potential exhaust of the NANP. While participating fully in the trials undertaken thus far in Illinois and New York, WinStar has urged the FCC and other regulators not to “declare victory and go home” in the absence of objective quantifiable benefits justifying the considerable costs associated with the deployment of number pooling. Indeed, the results of trials in the 847 and 212 NPAs showed a minimal extension in the life of those NPAs as a result of the introduction of pooling. Pooling proponents have contended that these mixed results are attributable to the late stage of exhaust at which pooling was introduced to those NPAs; WinStar is willing to acknowledge at least the *possibility* that this explanation is correct.

At the same time, WinStar incurs a cost of \$100,000 to \$250,000 to prepare its operational support systems each time a new pooling market is introduced. In addition, ongoing operating costs rise by between one and nearly three percent, depending on the market, each time pooling is introduced. These significant expenditures are well justified if they lead to an increase of years in the life of an area code. However, if the increased life is measurable only in weeks or months, as has proven to be the case in the two ongoing trials, the expenditure for the industry and for each individual service provider would appear to be unnecessary at best, and counterproductive at worst.

In previous comments and in *ex parte* meetings with the FCC, WinStar has advocated an expanded trial that involves NPAs that are not in an advanced stage of exhaust.¹¹ Such a trial would provide the necessary objective and quantifiable data to determine, before substantial additional expenses are incurred, whether pooling is in fact an effective measure to improve number utilization. To accomplish that end, the FCC perhaps could add Ohio to the list of states

¹¹ See, e.g., *WinStar Numbering Comments* at 25-27.

to undertake such an expanded trial. However, WinStar believes that the virtually automatic grant of authority to order pooling to every state that requests it is a risky procedure which forces service providers, and ultimately ratepayers, to spend money on a measure which may provide an unacceptably small return on investment.

VI. AUTHORITY TO ORDER TECHNOLOGY- OR SERVICE-SPECIFIC OVERLAY AREA CODES

Finally, WinStar is particularly troubled by the PUCO's request for authority to order technology- or service-specific overlay area codes, and by the apparently widespread belief among state regulators that technology- and service-specific overlay area codes will conserve precious numbering resources.¹² Unlike number pooling trials, which are quite new and require additional investigation and perhaps modification to prove or disprove the efficacy of pooling, the technology-specific overlay has been tried over a long period of time in an area which is particularly well suited to the trial, and has been found to be a failure. WinStar speaks specifically of the 917 technology-specific overlay in New York City.

New York has, beyond question, one of the highest CMRS penetration rates in the country, and the 917 overlay has been in place now for more than a decade. Yet the New York Department of Public Service, in conjunction with the industry, recently decided to abandon 917 as a technology-specific overlay and instead convert it to a general-purpose overlay. The reasoning for the change is the fact that the 917 code remains largely unused after more than a decade, while the geographic codes which it overlays are all in varying, and mostly advanced, stages of exhaust. Clearly, in one of the largest CMRS markets in the world, the technology-

¹² Petition at 7.

specific overlay has been an abysmal failure. Empirical evidence alone suggests that it should not be tried further.

However, there is an additional and equally compelling reason to reject implementation of a technology-specific overlay. The Telecommunications Act of 1996 envisions a day when numbers will be portable across technologies – that is, when a wireline customer will be able to port a number to a CMRS handset, or *vice versa*. If the Commission allows technology-specific overlays to proliferate, a statutory barrier would be erected to this type of porting. If the FCC is sincere in its order granting forbearance to the CMRS industry segment from porting only through 2002, the agency must not permit these barriers to be erected by the states or by anyone else. Otherwise, porting between technologies may never become a reality.

CONCLUSION

Once again, WinStar applauds the creative thinking which the PUCO used to prepare its petition for additional authority. WinStar believes that, for the most part, the direction taken is appropriate. At the same time, WinStar feels strongly that all participants in the process should be allowed input to craft these new procedures as part of the consensus process that has served regulators, the industry, and consumers since the opening of the telecommunications market to competition. An inclusive process is the best way to achieve maximum benefit for all. Accordingly, for the foregoing reasons, WinStar urges the Commission to grant additional numbering optimization authority to the PUCO only to the extent consistent with these comments.

Respectfully submitted,

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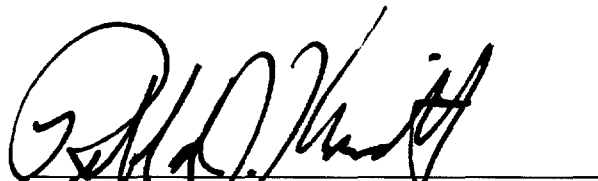
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